

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of 73.202 (b))	MB Docket No. 02-248
Table of Allotments)	RM-10537
FM Broadcast Stations)	
(Smiley, Texas))	

To: John Karousos, Assistant Chief
Audio Division of the
Media Bureau

REPLY TO OPPOSITION TO LINDA CRAWFORD RESPONSE

I, Linda Crawford, hereby Reply to the “Opposition to Linda Crawford Response” submitted by New Ulm Broadcasting Company (hereinafter “New Ulm”) in the above-captioned proceeding.

1. On November 15, 2002, I filed a “Motion for Leave to File Response” and a “Response of Linda Crawford to Reply Comments of New Ulm Broadcasting and LBR Enterprises, Inc.” As stated in the Motion, the purpose of the filing was to address new matters raised in the New Ulm and LBR Enterprises Reply Comments that could not have been anticipated from earlier pleadings.’ On November 29, 2002, New Ulm filed an “Opposition to Linda Crawford Response”.

2. New Ulm states that “it is clear from Crawford’s Reply Comments that she was fully aware of the Elgin filing and its conflict with the original New Ulm site

¹ As of this date, LBR Enterprises, Inc. has not served the Petitioner with an opposition to the November 15, 2002 “Motion for Leave to File Response” or the “Response of Linda Crawford to Reply Comments of New Ulm Broadcasting and LBR Enterprises, Inc.”

coordinates for Schulenhrg”. When checking the FCC engineering database before I filed my Reply Comments, the conflict with KKLb/ Elgin was apparent. I included the conflicting FCC engineering report in my “Reply Comments of Linda Crawford” as Exhibit #6. Somehow, New Ulm thinks that I should have anticipated that they would attempt to modify their original site coordinates, despite the obvious disadvantage to the original Smiley Petitioner. New Ulm incorrectly states in their Reply Comments that they can specify new reference coordinates for Channel 222C3 at Schulenburg, and that to do so “does not change the overall new Ulm proposal in any recognizable way, or to the prejudice of any party”. This is incorrect. As I have addressed in my “Response of Linda Crawford to Reply Comments of New Ulm Broadcasting and LBR Enterprises, Inc.” the New Ulm Counterproposal was fatally flawed when filed as a result of the short spacing with KKLb.² Furthermore, the Commission has held that it will not allow rulemaking participants to perfect their proposals after the comment date to the prejudice of another party.³

3. Additionally, New Ulm chose to attack my Reply Comments. The information included in my Reply Comments were in direct response to questions raised and or inaccurate statements by New Ulm and LBR Enterprises. Among other things, New Ulm claimed in their Reply Comments that I did not provide adequate information in my original Petition to establish Smiley as a community for allotment purposes. New Ulm cites the Pleasant Dale, Nebraska case as the legal authority for this claim. The distinction between Pleasant Dale and Smiley is that the Commission requested in the Pleasant Dale Notice that the petitioner provide additional information to demonstrate

² See Broken Arrow and Bixby, Oklahoma, Coffeyville, Kansas, 3 FCC Rcd 6507 (MM Bur. 1988).

³ See Santa Margarita and Guadalupe, California, 4 FCC Rcd 7887 (MM Bur. 1989)

that Pleasant Dale qualified as a community for allotment purposes. The Pleasant Dale Petitioner failed to provide sufficient information to the Commission in their supporting comments. The Commission made no such request to the Petitioner in the Smile Notice. In direct response to questions raised by New Ulm in their Comments, I did provide further information regarding the community of Smiley.

4. New Ulm continues to make references to and certifies in their engineering statement to a “white area” which will be covered by Channel 222C3 at Schulenburg. In their Counterproposal, New Ulm identifies Schulenburg as a “white area” with no recognizable AM or FM reception service at all. In their Opposition, they say Schulenburg is a town of 2,699 persons, all unserved white area. New Ulm continues in their Opposition to say, “The only prejudice that could occur in this proceeding to anyone would be to the public interest if that new white-area service proposed for Schulenburg were ever denied.” According to the attached Radio-Locator maps included in Exhibit C, the town of Schulenburg receives a 2.5 mV/m coverage from at least seven AM stations. These stations are: KTSA, KLBJ, KKYX, KSEV, KSAH, KTRH and WOAI. Additionally, the town of Schulenburg receives at least partial 60 dBu coverage from FM station KTXM. Therefore, the “white area” certified in the engineering statements filed by New Ulm is a bogus claim. It now appears that New Ulm’s Counterproposal will not result in service to either a “white area” or a “gray area” and therefore, the claim of “white area” by New Ulm should be dismissed.

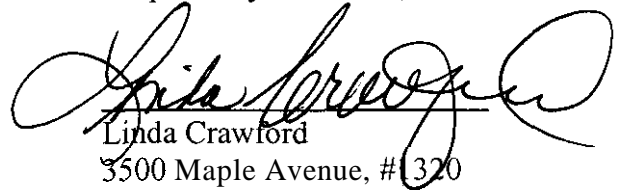
5. Finally, the reference by New Ulm to FCC Public Notice No. 2487 on June 1, 2001 has been misapplied. The Public Notice has no direct relationship to the matters under consideration in this NPRM proceeding. In Public Notice No. 2487,

involving Thomdale, Texas, the Notice relates to an attempt by an NCE applicant to have their application severed off from the original pool of applicants in order to obtain a separate and protected status independent of the original FM filing window. Ultimately, the Commission never issued a useful decision that New Ulm could logically apply to the NPRM under consideration for Smiley, Texas. (see Exhibit A, Public Notice, Report No. 2487) and (see Exhibit B, Thomdale, Texas NPRM, MM Docket No. 99-243)

6. For the foregoing reasons, I urge the Commission to allot Channel 280A to Smiley, Texas and deny the New Ulm Broadcasting Company and LBR Enterprises, Inc. Counterproposals. Should this petition be granted, and Channel 280A be allotted to Smiley, Texas, Petitioner will apply for Channel 280A, and after it is authorized, will promptly construct the new facility.

The factual information provided in this Reply to "Opposition to Linda Crawford Response" of New Ulm Broadcasting is correct and true to the best of my knowledge

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Linda Crawford", is written over a horizontal line.

Linda Crawford
3500 Maple Avenue, #1320
Dallas, Texas 75219
(214) 587-0668

cc: Gene A. Bechtel, Law Office of Gene Bechtel, suite 600, 1050 17th Street, N.W., Washington, D.C. 20036, telephone (202) 496-1289, telecopier (301) 762-0156, attorney for the Petitioner. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as the Petitioner.

December 19, 2002

Exhibit A

Public Notice, Report No. 2487.



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

News Media Information 202 / 418-0500
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Report No. 2487

June 1, 2001

25154

CONSUMER INFORMATION BUREAU
REFERENCE INFORMATION CENTER
PETITIONS FOR RULEMAKING FILED

Interested persons may file statements opposing or supporting the Petitions for Rulemaking listed herein within 30 days, or as noted.
See Sections 1.4 and 1.405 of the Commission's rules for further information.

RM NO.	RULES SEC.	PETITIONER	DATE RECEIVED	NATURE OF PETITION
10121*	73.202(b)	Munbilla Broadcasting Corporation (Filed By John J. McVeigh, 12101 Blue Paper Trail Columbia MD 21044 2787)	08/17/99	Request Amendment of the FM Table of Allotments to allot Channel 286A at Rosebud, Texas, at coordinates 31-05-40 and 97- 00-03.
10122*	73.202(b)	Elgin FM Limited Partnership (Filed by Ann C. Farhat, 1901 L Street, N.W. Suite 2.50 Washington, D.C. 20036)	08/17/99	Request Amendment of the FM Table of Allotments to allot Channel 286A at Thrall, Texas, at coordinates 30-38-45 and 97-09- 12.

10123**

73.202(b)

Cameron Broadcasting
Company

12/02/98

(Filed by Henry E. Crawford.
1990 M Street, N.W.
Suite 510
Washington, D.C. 20036)

Request Amendment of the FM
Table of Allotments to **substitute**
Channel 286C3 for Channel 232A at
Cameron, Texas, and modification
of the construction permit for Station
KTTZ (FM), at coordinates 30-51-30
and 97-01-47 **will** be accepted as a
counterproposal in this proceeding.

*THE COUNTERPROPOSAL FILED BY MUNBILLA BROADCASTING CORPORATION AND ELGIN FM LIMITED PARTNERSHIP ARE SHORT-SPACED TO A ONE-STEP APPLICATION TO SUBSTITUTE CHANNEL 286C3 FOR CHANNEL 232A AT CAMERON, TEXAS (BMPH-199812011A). PARTIES ARE GIVEN 15 DAYS FROM THE DATE OF THIS PUBLIC NOTICE TO AMEND THEIR COUNTERPROPOSALS TO PROTECT THE SITE OF THE PREVIOUSLY FILED FM APPLICATION AT CAMERON, TEXAS. FOR CHANNEL 286C3.

**THE ABOVE PETITION FOR RULEMAKING WILL BE TREATED AS COUNTERPROPOSAL IN MM DOCKET NO. 99-243. REPLY COMMENTS TO THIS COUNTERPROPOSAL SHOULD BE SUBMITTED IN THIS DOCKET NO LATER THAN 15 DAYS [RATHER THAN 30 DAYS) AFTER THE DATE OF THIS PUBLIC NOTICE.

FCC

Exhibit B

Thorndale, Texas NPRM, MM **Docket** No. 99-243.

FCG MAIL SECTION

Federal Communications Commission

DA 99-1292

Jut 2 3 3E PM '99

DIS Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 99-242
Table of Allotments,		RM-9676
FM Broadcast Stations.		
(Breckenridge, Texas))	
)	
(Thorndale, Texas))	MM Docket No. 99-243 ✓
)	RM-9675
)	

NOTICE OF PROPOSED RULE MAKING

Adopted: June 23, 1999

Released: July 2, 1999

Comment Date: August 23, 1999

Reply Date: September 7, 1999

By the Chief, Allocations Branch

1. Before the Commission for consideration is a multiple docket Notice of Proposed Rule Making setting forth separate proposals to amend the FM Table of Allotments, Section 73.202(b) of the Rules. Each petitioner has stated that it will apply for its requested channel, if allotted. We believe that each proposal warrants consideration because it complies with our technical requirements and would serve the public interest.

2. This is a multiple docket Notice of Proposed Rule making issued in response to a Commission Public Notice released October 2, 1998 (DA 98-1987). We are combining separate FM allotment proposals into a single Notice of Proposed Rule Making. Each proposal has its own docket and rule making number and the Commission's Reference Center will maintain a separate file for each docket. As discussed in the Public Notice, this procedure will conserve Commission resources and expedite the processing of FM allotment petitions for rule making by avoiding duplicative actions. We request comments and/or counterproposals to the following proposals:

A. MM Docket No. 99-242. RM-9676

Petitioner: Breckenridge Radio Broadcasting Company

c/o Robert Lewis Thompson
Taylor Thiemann & Aitken, L.C.
908 King Street, Suite 300
Alexandria, Virginia 22314

Proposal: Allot Channel 261A at Breckenridge, Texas, providing additional broadcast service to the community.

Community	Present	Proposed
Breckenridge, Texas	228C2	228C2, 261A

Coordinates: 32-44-34 NL and 98-54-32 WL

Additional Information: Channel 261A can be allotted to Breckenridge with a site restriction. 1.5 kilometers (0.9 miles) south of the community. The site restriction will prevent a short spacing to Station KLUR, channel 260C1, Wichita Falls, Texas. Breckenridge is an incorporated community located in Stephens County. Breckenridge has its own post office and zip code (76424) and a population of 5,665 people according to the 1990 **U.S.** Census.

FCC Contact: Kathleen Scheuerle, (202) 418-2180

B. MM Docket No. 99-243, RM-9675

Petitioner: Houston Christian Broadcasters, Inc.

c/o Jeffrey D. Southmayd
Southmayd & Miller
1220 Nineteenth Street, N.W., Suite 400
Washington, D. C. 20036

Proposal: Allot Channel 286A at Thorndale, Texas, reserve the channel for noncommercial educational use and amend the application filed by Houston Christian Broadcasters, Inc. for Channel 257A to specify operation on Channel *286A (File No. BPED-970911MA).

Community	Present	Proposed
Thomdale, Texas	257A	257A, *286A

Coordinates: 30-36-54 NL and 97-12-18 WL

Additional Information: Presently there are six applicants for Channel 257A at Thorndale. The mutually-exclusive Thomdale FM applications have been held in abeyance by the Commission due to the suspension of the comparative licensing procedures. Because of developments related

to our comparative licensing procedures, we are currently unable to designate these applications for a comparative hearing or otherwise resolve these mutually exclusive applications. See Bechtel v. FCC, 10 F.3d 875 (D. C. Cir. 1993). Therefore, Houston Broadcasters, the only applicant proposing to use Channel 257A at Thorndale as a noncommercial educational station. in an attempt to resolve the mutually exclusive application conflict, is requesting the allotment and reservation of Channel 286A at Thorndale and amendment of its application for Channel 257A accordingly.

Houston Broadcasters has provided sufficient information showing that the Grade A contour of Channel 6 Television Station KCEN-TV, Temple, Texas, prohibits the use of channels in the reserved portion of the FM Band in Thorndale (Channels 201-220). The allotment and reservation of a commercial channel appears to be the only way Houston Broadcasters can provide interference-free noncommercial educational service to Thorndale. Therefore, we shall propose the allotment of Channel 286A and its reservation for noncommercial educational use at Thorndale and amendment of Houston Broadcaster's application for Channel 257A to specify operation on Channel *286A. We are requesting specific comment as to whether Channel 286A should be reserved for noncommercial educational use. Furthermore, in the event a new party expresses an interest in Channel *286A at Thorndale, we will allot the channel for general application if no preferable counterproposals are received by the comment date. Channel *286A can be allotted to Thorndale without a site restriction. A Commission engineering analysis further indicates that Channel 286A is the only commercial channel that can be allotted to Thorndale. Therefore, any expressions of interest for the use of the channel for a commercial facility should be made during the comment period.

3. Comments, reply comments, counterproposals and other pleadings filed in response to this multiple docket Notice of Proposed Rule Making should reference only the specific docket to which the filing pertains. The Commission's authority to institute rule making proceedings, showings required, cut-off procedures, and filing requirements are contained in the attached Appendix and are incorporated by reference herein. In particular, we note that a showing of continuing interest is required in paragraph 2 of the Appendix before a channel will be allotted.

4. Interested parties may file comments on or before , 1999, and reply comments on or before , 1999, and are advised to read the Appendix for the proper procedure. Additionally, a copy of any filing should be served on the petitioner listed for the particular docket.

5. The Commission has determined that the relevant provisions of the Regulatory Flexibility Act of 1980 do not apply to rule making proceedings to amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules. See Certification that Sections 603 and 604 of the Regulatory Flexibility Act Do Not Apply to Rule Making to Amend Sections 73.202(b) and 73.606(b) of the Commission's Rules, 46 FR 11549, February 9, 1981.

6. For further information concerning a proceeding listed above, contact the FCC contact listed for that proceeding. For purposes of this restricted notice and comment rule making proceeding, members of the public are advised that no ex parte presentations are permitted from

the time the Commission adopts a Notice of Proposed Rule Making until the proceeding has been decided and such decision is no longer subject to reconsideration by the commission or review by any court. An ex parte presentation is not prohibited if specifically requested by the Commission or staff for the clarification or adduction of evidence or resolution of issues in the proceeding. However, any new written information elicited from such a request or a summary of any new oral information shall be served by the person making the presentation upon other parties to the proceeding unless the Commission specifically waives this service requirement. Any comment which **has** not been served on the petitioner constitutes an ex parte presentation and shall not be considered in the proceeding. Any reply comment which has not been served on the person(s) who filed the comment, to which the reply is directed, constitutes an ex parte presentation and shall not be considered in this proceeding.

FEDERAL COMMUNICATIONS COMMISSION

John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

APPENDIX

1. Pursuant to authority found in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61, 0.204.(b) and 0.283 of the Commission's Rules, **IT IS PROPOSED TO AMEND** the **FM** Table of Allotments, Section 73.202(b) of the Commission's Rules and Regulations, as set forth in the Notice of Proposed Rule Making to which this Appendix is attached.

2. Showings Required. Comments are invited on the proposal(s) discussed in the Notice of Proposed Rule Making to which this Appendix is attached. Proponent(s) will be expected to answer whatever questions are presented in initial comments. The proponent of a proposed allotment is also expected to file comments even if it only resubmits or incorporates by reference its former pleadings. It should also restate its present intention to apply for the channel if it is allotted and, if authorized, to build a station promptly. Failure to file may lead to denial of the request.

3. Cut-off Procedures. The following procedures will govern the consideration of filings in this proceeding.

(a) Counterproposals advanced in this proceeding itself will be considered if advanced in initial comments, so that parties may comment on them in reply comments. They will not be considered if advanced in reply comments. (See Section 1.420(d) of the Commission's Rules).

(b) With respect to petitions for rule making which conflict with the proposal(s) in this Notice, they will be considered as comments in the proceeding, and Public Notice to this effect will be given as long as they are filed before the date for filing initial comments herein. If they are filed later than that, they will not be considered in connection with the decision in this docket.

(c) The filing of a counterproposal may lead the Commission to allot a different channel than was requested for any of the communities involved.

4. Comments and Reply Comments: Service. Pursuant to applicable procedures set out in Sections 1.415 and 1.420 of the Commission's Rules and Regulations, interested parties may file comments and reply comments on or before the dates set forth in the Notice of Proposed Rule Making to which this Appendix is attached. All submissions by parties to this proceeding or by persons acting on behalf of such parties, must be made in written comments reply comments, or other appropriate pleadings. Comments shall be served on the petitioner by the person filing the comments. Reply comments shall be served on the person(s) who filed comments to which the reply is directed. such comments and reply comments shall be accompanied by a certificate of service. (See Section 1.420(a), (b) and (c) of the Commission's Rules.) Comments should be filed with the Secretary, Federal Communications Commission, Washington, 445 Twelfth Street, S. W.; TW-A325, Washington, D. C. 20554.

5. Number of Copies. In accordance with the provisions of Section **1.420** of the Commission's Rules and Regulations, an original and four copies of all comments, reply comments, pleadings, briefs, or other documents shall be furnished the Commission.

6. Public Inspection of Filings. All filings made in this proceeding will be available for examination by interested parties during regular business hours in the Commission's Public Reference Room at its Headquarters, Washington, D. C.

Exhibit C

Engineering Exhibit reflecting no “white area” or “gray area” coverage by the New Ulm Counterproposal.



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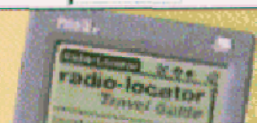
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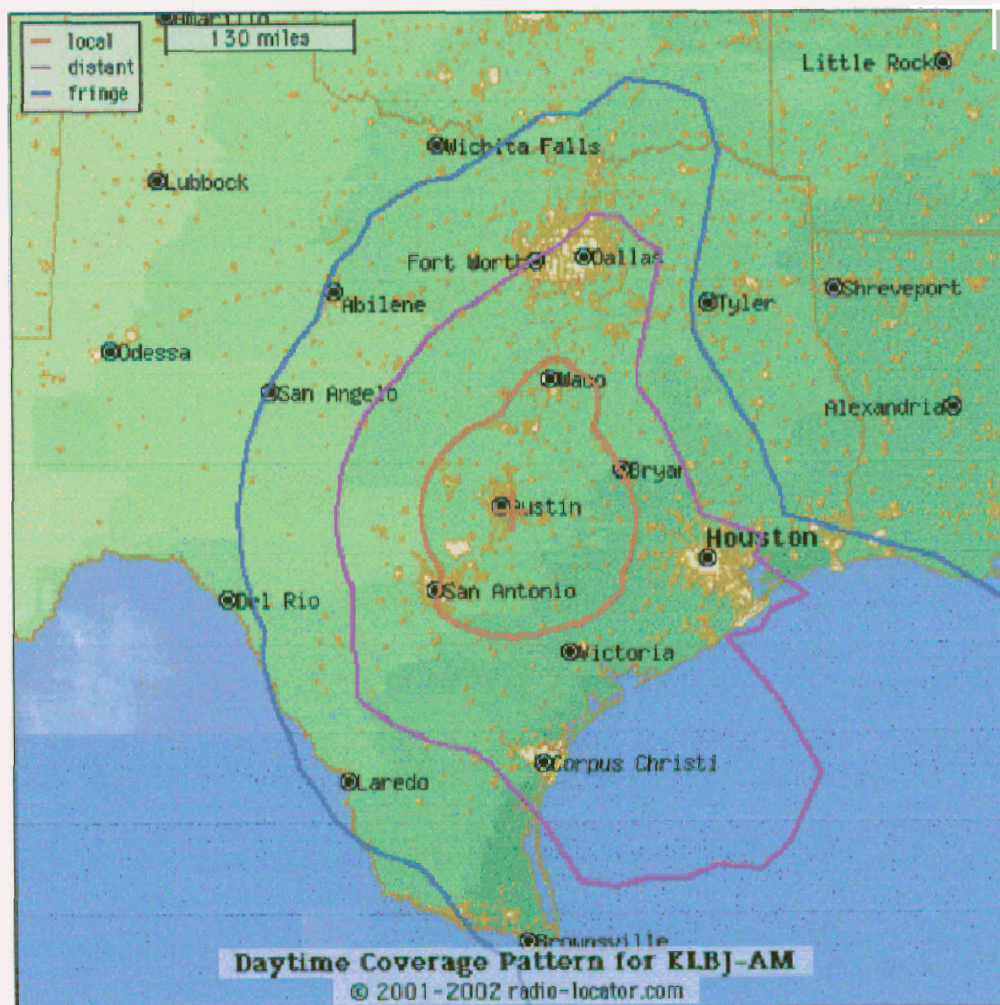
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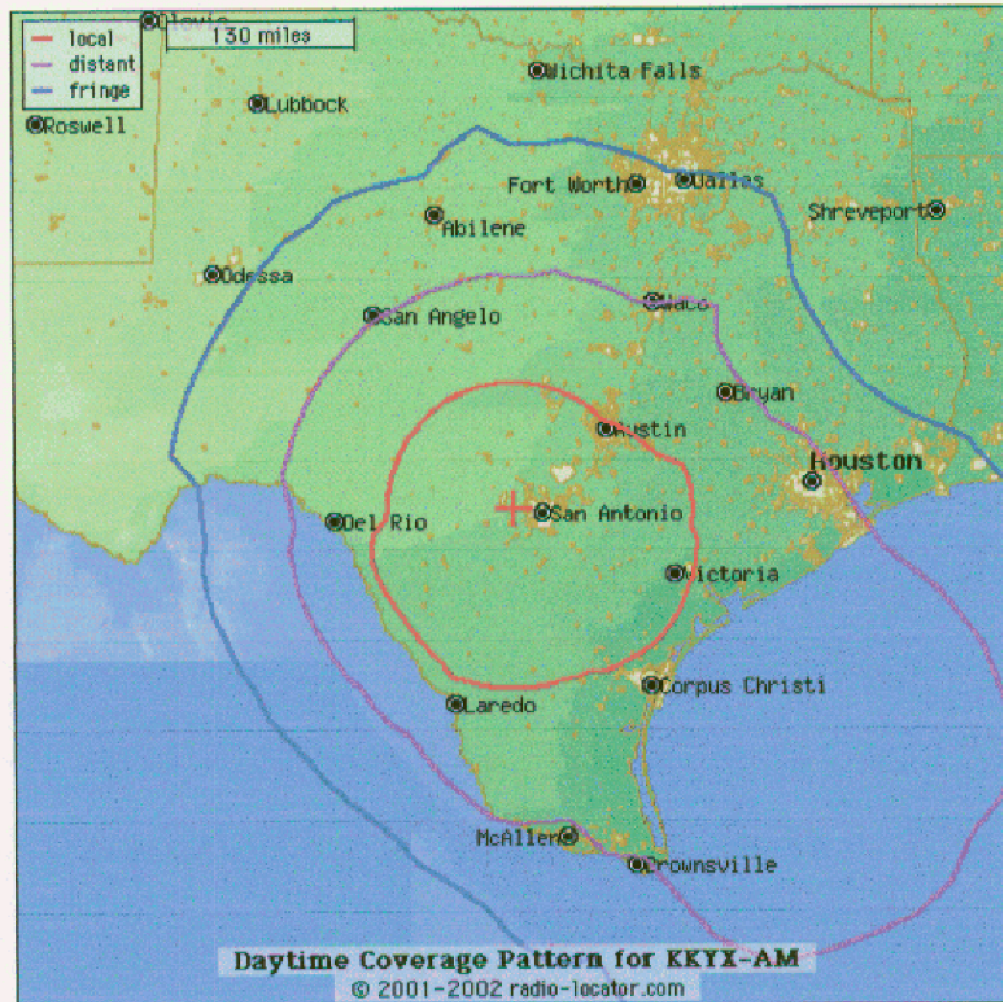
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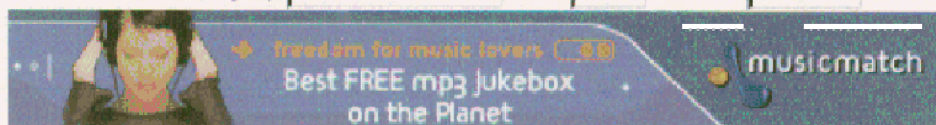
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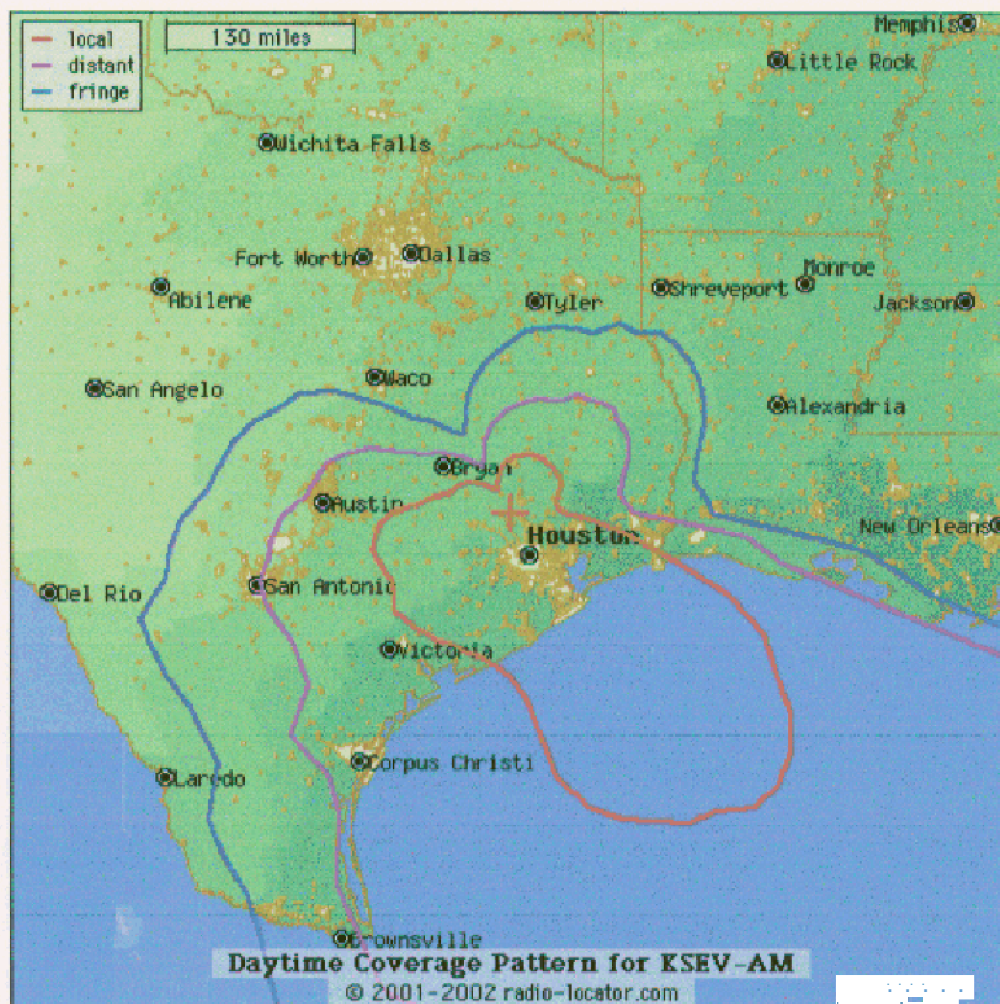
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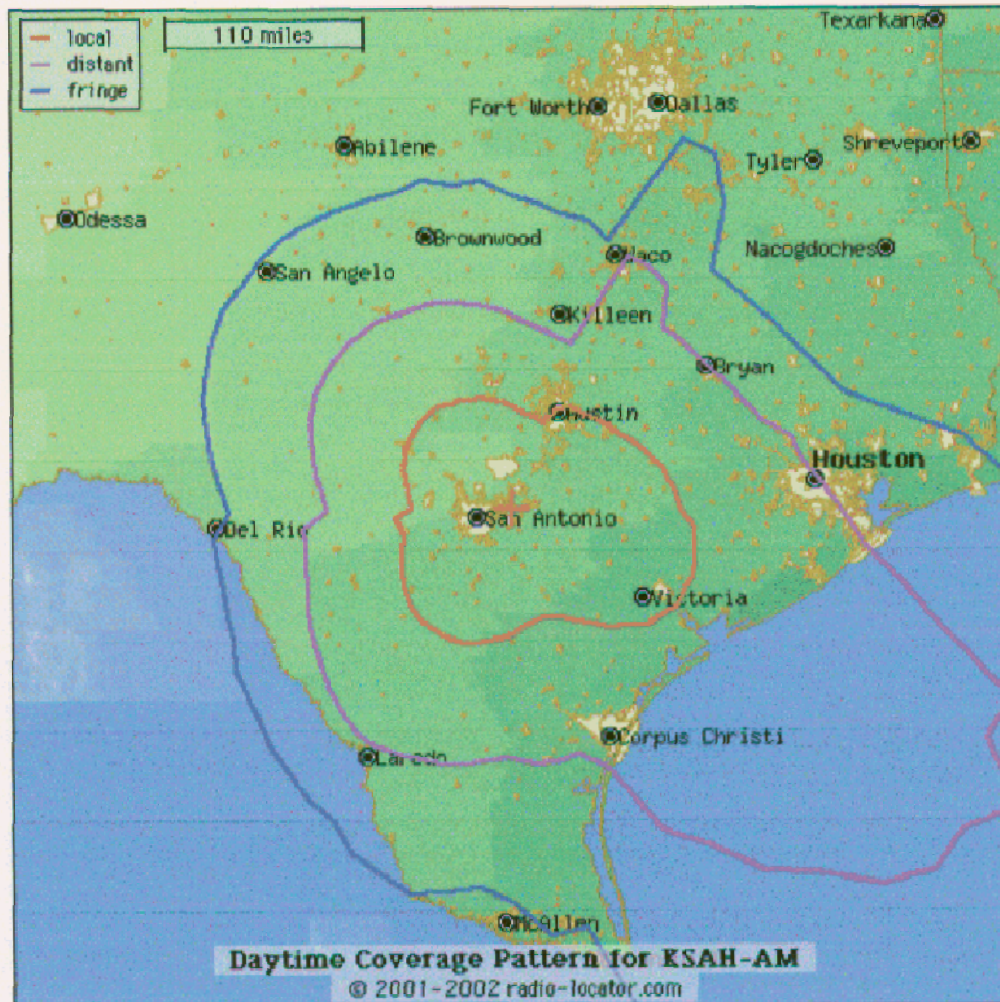
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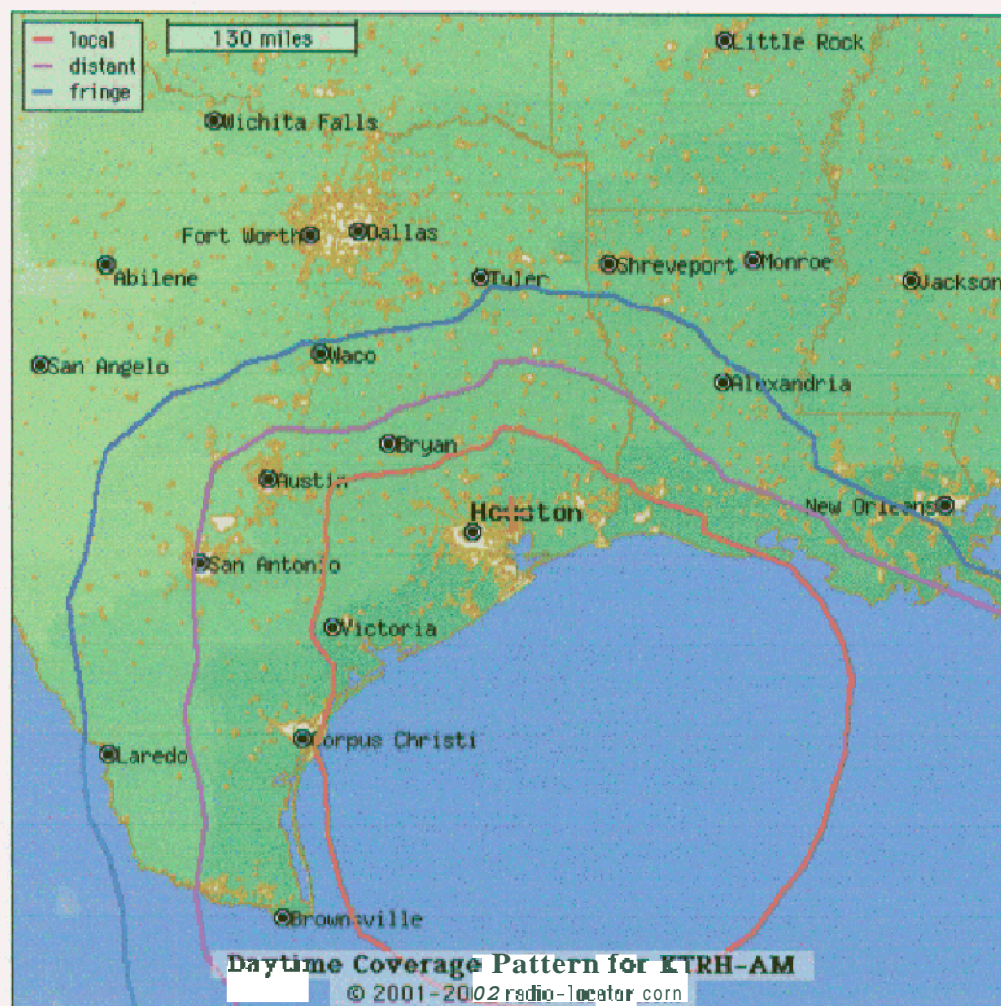
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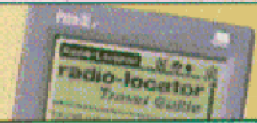
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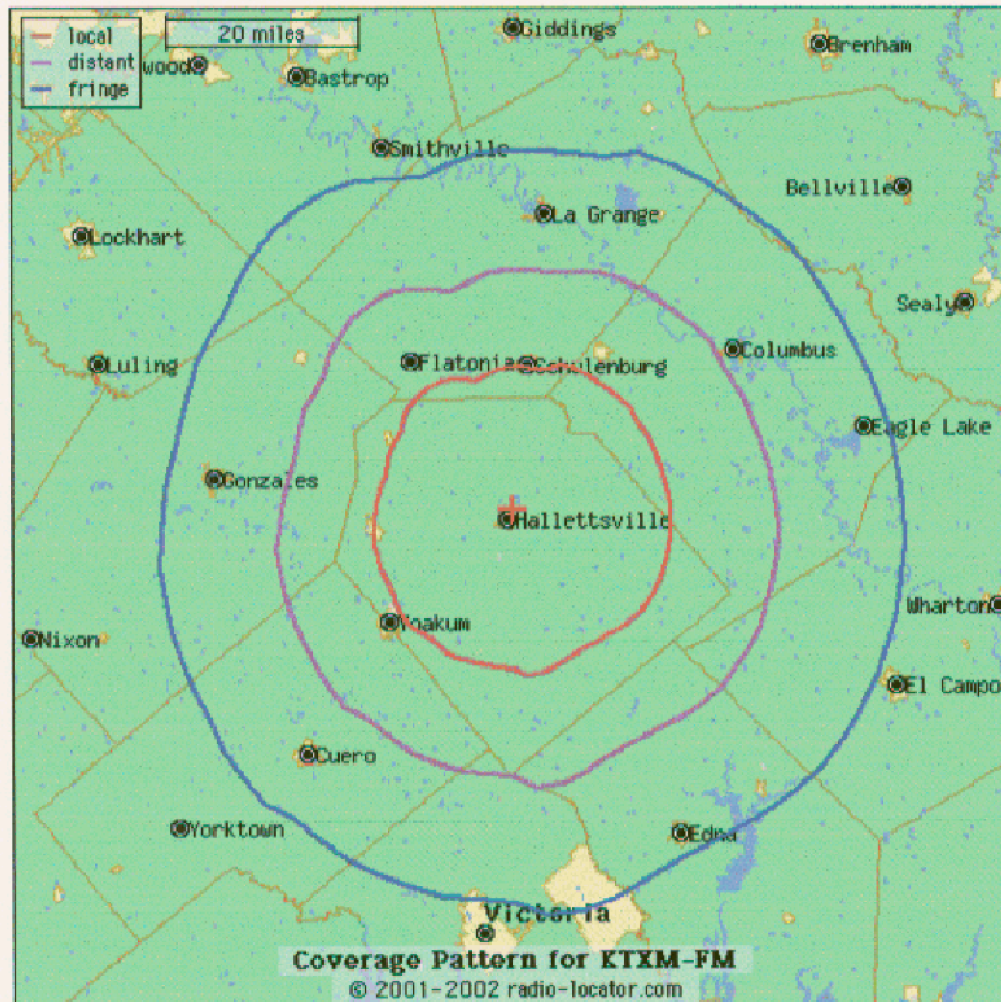
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Predicted coverage pattern for [KTXM 99.9 FM](#), Hallettsville, TX



This image is intended solely for entertainment purposes. Radio-Locator makes no claims as to the accuracy of this information, nor towards its suitability for any intended purpose.

How are these maps drawn? What do they mean? Why do they look so funny?

For the answer to these and other questions, please see our new [Coverage Maps FAQ!](#)

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Frequently Asked Questions about Radio-Locator Coverage Maps

Last updated: April 22, 2002

1. These maps are cool, how are they drawn?

These maps are drawn using engineering data from the FCC. The coverage pattern for each FM station is calculated using the effective radiated power (ERP) of the station and the antenna height above average terrain (HAAT). The HAAT is calculated in all directions based upon the average ground elevation between 1.5 and 10 miles from the station in each direction.

The coverage pattern for each AM station is based on the standard horizontal field strength pattern, the frequency of the station, and the ground conductivity of the local area.

2. What do the red, purple, and blue lines mean?

The red, purple, and blue lines correspond to the "local", "distant", and "fringe" coverage areas of each radio station:

- **Local Coverage:** Within this area, you should be able to receive the radio station on almost any radio with moderately good to very good reception.
- **Distant Coverage:** Within this area, the signal of the radio station may be weak unless you have a good car radio or a good stereo with a good antenna. You may not be able to receive the station at all on walkmans or other portable radios.
- **Fringe Coverage:** Within this area, the station's signal will be very weak. You may be able to receive this station if you have a very good radio with a good antenna, but it's possible that interference from other stations may prevent you from picking up these stations at all.

3. What criteria do you use to define the "local", "distant" and "fringe" coverage areas?

The "local", "distant" and "fringe" lines on the FM maps correspond to the predicted 80, 50, and 40 dBu field strength contours respectively.

The "local", "distant" and "fringe" lines on the AM maps corresponds to the predicted 2.5, 0.5, and 0.15 mV/m contours respectively (of the horizontal groundwave propagation only).

4. Why do the AM patterns look so funny?

There are two factors that might give an AM station an odd looking coverage area: directional antenna patterns and ground conductivity.

- **AM Antenna Patterns:** AM radio stations with one tower transmit their signal with equal strength in all directions. These stations have a circular, or "non-directional" antenna pattern. AM stations that have more than one tower can precisely tune their antenna patterns to a very specific shape. The number of towers, the spacing and orientation of each tower, and the phase and ratio of the signal that is sent to each tower all combine to create an antenna pattern that might look heart-shaped (cardioid), peanut-shaped, or shaped like a 3, 4, or multi-leaf clover. [WOBL-AM](#) in Oberlin, Ohio, for example, has 4 towers and a daytime antenna pattern that looks a little like [Casper the friendly ghost!](#)

- **Ground Conductivity** To a large degree, AM radio signals travel through the ground. This means that the electrical conductivity of the ground greatly affects how far the radio signal will travel. The geology of the United States varies greatly from one area to another, and this affects the conductivity of the earth. Sea water, however, has a much higher conductivity than the ground, so AM radio signals will always travel much farther over sea water than over land. [WCBS-AM](#) in New York City, for example, has one tower and a circular antenna pattern, but [as you can see](#), its signal travels much farther over the water. You can learn more about ground conductivity at [the FCC's website](#).

5. Why do the FM patterns look so funny?

FM radio stations can also have directional antenna patterns, although FM patterns are usually not as severe as AM patterns. FM radio waves, however, are called "line of sight", which means that they do not travel well through solid objects, such as mountains or hills. [KFMD-FM](#) in Denver, Colorado, for example, has relatively flat land to the east, but mountains to the west. This means that it can [transmit much farther to the east than to the west](#).

6. How accurate are these maps?

These maps are generated using the same data and most of the same algorithms that the FCC uses when trying to predict coverage of radio stations and interference with other nearby radio stations.

However, there are many factors that contribute to radio reception. One of the biggest factors is your radio -- some radios will perform much better than others in trying to pick up distant radio stations. Other factors include interference from radio signals bouncing off nearby buildings (*multipath interference*), interference from other stations on adjacent frequencies. Very mountainous terrain, or very non-typical geology can also affect radio signals. At night, AM signals can bounce off the ionosphere and travel great distances.

We hope that you enjoy using these maps, but we also hope you understand that they are "predictions" based upon the information that we have available to us, and that your actual reception of these stations may vary considerably.

If your question was not answered here, please write to: webmaster@radio-locator.com.

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CERTIFICATE OF SERVICE

I, Linda Crawford, hereby certify that on this 19th day of December, 2002, I caused copies of the foregoing "REPLY TO OPPOSITION TO LINDA CRAWFORD RESPONSE" to be placed in the U.S. Postal Service, first class postage prepaid, addressed to the following persons:

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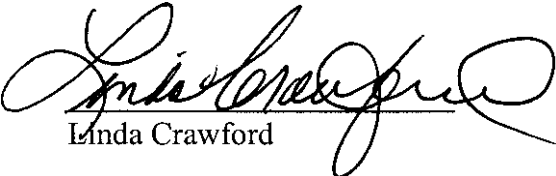
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